

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: ROBERT JOSEPH KROBOTH and) CHAPTER 12
MELANIA ANN KROBOTH,)
Debtors) No. 16-13342-PMM
)
) Hearing Date: June 25, 2020
) Time: 11:00 a.m.
) Location:
) U.S. Bankruptcy Court
) The Gateway Building
) 201 Penn Street, 4th Floor
) Reading, PA 19601**

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

NOTICE IS GIVEN THAT, the Debtors in the above-captioned case filed a Motion to Modify Chapter 12 Plan Post- Confirmation Pursuant to 11 U.S.C. §1229

The Debtors seek to amend their Plan to change the dates of their remaining Plan payments for 2020 and 2021 from quarterly to four equal monthly payments in September, October, November and December of each year.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this Bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant this Motion, then on or before **June 17, 2020**, you or your attorney must do all of the following:

- a) file an answer explaining your position at:

**Clerk/United States Bankruptcy Court
The Gateway Building
201 Penn Street, 4th Floor
Reading, PA 19601**

If you mail your answer to the Bankruptcy Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- b) mail a copy to the Movant's attorney:

**David B. Schwartz, Esquire
514 Fullerton Ave., Suite 2
Whitehall, PA 18052
Tel: 610-434-2023
Fax: 610-432-4552
Email: dbsesquire@gmail.com
Counsel for Debtors**

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the Motion.

3. A hearing on the Motion is scheduled to be held before the Honorable Patricia M. Mayer, United States Bankruptcy Judge, on **June 25, 2020, in Courtroom #4 at the United States Bankruptcy Court, The Gateway Building, 201 Penn Street, 4th Floor, Reading, PA 19601**, as soon thereafter as counsel can be heard, to consider the motion.

4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's Office at (610) 208-5040 to find out whether hearing has been set and, if so, the date and time of the hearing.

Filing Instructions

6. If you are required to file documents electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically.

7. If you are not required to file electronically, you must file your response at:

**Clerk/United States Bankruptcy Court
The Gateway Building
201 Penn Street, 4th Floor
Reading, PA 19601**

8. If you mail your response to the Bankruptcy Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated in paragraph 2 on the previous page of this Notice.

9. On that same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the Movant's attorney:

**David B. Schwartz, Esquire
514 Fullerton Ave., Suite 2
Whitehall, PA 18052
Tel: 610-434-2023
Fax: 610-432-4552
Email: dbsesquire@gmail.com
Counsel for Debtors**

Dated: 5/27/2020

GOODMAN, SCHWARTZ & SHAW LLC

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